

FILED

JUL 05 2018 *PS*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

) No. 18 CR 105
)

v.)

) Violations: Title 18, United States
) Code, Sections 2251(a), 2252A(a)(1),
) and 2252A(a)(5)(B)

ADAM SPRENGER)

)

JUDGE THARP

MAGISTRATE JUDGE MARTIN

COUNT ONE

The SPECIAL FEBRUARY 2017 GRAND JURY charges:

Between on or about March 22, 2015, and on or about March 24, 2015, in the Northern District of Illinois, Eastern Division, and elsewhere, including the Eastern District of Wisconsin,

ADAM SPRENGER,

defendant herein, knowingly employed and used a minor, namely, Victim A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the visual depiction was transported using any means and facility of interstate commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about April 7, 2017, and on or about November 14, 2017, at Arlington Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADAM SPRENGER,

defendant herein, knowingly employed and used a minor, namely, Victim B, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was transported using any means and facility of interstate commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about November 14, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADAM SPRENGER,

defendant herein, knowingly transported and caused to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, a video entitled 20170407_021005.mp4, using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT FOUR

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 14, 2018, at Arlington Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADAM SPRENGER,

defendant herein, knowingly possessed material, namely (1) an HP laptop computer, model Pavilion DM4, bearing serial number CNU1311MPR; (2) an HP laptop computer, model Compaq nc6400, bearing serial number CND70528HT; (3) a Verizon Samsung Galaxy S7 cellular phone, bearing IMEI number 359764081485953; (4) a Samsung EVO 16GB micro SD card, bearing serial number KPABT27PB629; and (5) a DANE-ELEC 2GB USB drive, bearing serial number 4820-B6C1, which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not yet obtained 12 years of age, such image having been shipped and transported using any means and facility of interstate and foreign commerce, and such image having been produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are incorporated here for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253.

2. As a result of his violation of Title 18, United States Code, Sections 2251(a), 2252A(a)(1), and 2252A(a)(5)(B), as alleged in this Indictment,

ADAM SPRENGER,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all right, title, and interest he has in any visual depictions described in Title 18, United States Code, Sections 2251 and 2252A, as well as any property, real or personal, used and intended to be used to commit or to promote the commission of the charged offenses, as well as any property traceable to the charged offenses.

3. The interests of defendant subject to forfeiture include, but are not limited to, the following items seized at defendant's residence on or about February 14, 2018:

- a. an HP laptop computer, model Pavilion DM4, bearing serial number CNU1311MPR;
- b. an HP laptop computer, model Compaq nc6400, bearing serial number CND70528HT;
- c. a Verizon Samsung Galaxy S7 cellular phone, bearing IMEI number 359764081485953;
- d. a Samsung EVO 16GB micro SD card, bearing serial number KPABT27PB629; and

- e. a DANE-ELEC 2GB USB drive, bearing serial number 4820-B6C1.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY